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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

BRONX CITY SERVICE AUTO REPAIR, INC.,

Case No. 20-11090(SMB)

Debtor.

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**DEBTOR'S APPLICATION FOR AUTHORITY TO EMPLOY
AND RETAIN R.G. QUINTERO & CO. AS ACCOUNTANT
FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

**TO THE HON. STUART M. BERNSTEIN,
UNITED STATES BANKRUPTCY JUDGE:**

Bronx City Service Auto Repair, Inc. by its proposed attorney, Carlos J. Cuevas, Esq., for its Application to Employ and Retain R.G. Quintero & Co. ("RGQ") as Accountant for the Debtor and Debtor-in-Possession respectfully represents:

1. The Debtor filed a Chapter 11 petition on May 1, 2020.
2. The Debtor continues to manage his property and operate its business.
3. No Committee of Unsecured Creditors has been appointed.
4. No Chapter 11 trustee has been appointed.
5. The Debtor needs to employ an accountant in this bankruptcy case. Accordingly, the

Debtor requests that RGM be retained as its accountant. RGM has experience in the field

of insolvency accounting, and it is qualified to act as its accountant in this bankruptcy case.

6. The professional services that RGM will be rendering will primarily focus upon the preparation of financial information for the Debtor's Disclosure Statement and Plan of Reorganization, including financial forecasts and liquidation analysis.
7. To the best of the Debtor's knowledge, RGM has no connection with the Debtor's creditors or any other party in interest or their respective attorneys.
8. The Debtor thinks that RGM is a "disinterested person" as the term is defined in Bankruptcy Code Section 101(14) in that RGM (a) is not a creditor, equity security holder or insider of the Debtor; (b) RGM is not and was not an investment banker for any outstanding security of the Debtor; (c) RGM has not been within three years before the date of the filing of the Debtor's petition an investment banker for a security of the Debtor, or an attorney for such investment banker in connection with the offer, sale, issuance of a security of the Debtor; (d) RGM is not and was not within two years before the date of the filing of the Debtor's petition a director, officer or employee of the Debtor or an investment banker specified in parts (b) or (c) of this paragraph; and (e) RGM does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or an investment banker specified in parts (b) or (c) of this paragraph, or for any other reason.
9. The Debtor desires to retain RGM under a general retainer. The hourly rates to be charged are as follows: Ronald G. Quintero, CPA. \$360.00 per hour.
10. RGM has not received a retainer.

11. No prior application for the relief sought herein has been made.

WHEREFORE, the Debtor respectfully requests that an order be entered authorizing it to retain R.G. Quintero & Co. pursuant to a general retainer to provide accounting services to it in this Chapter 11 case and to perform all of the services set forth in this Application and for such other and further relief as this Court may deem just and equitable.

Dated: Bronx, New York
July 15, 2020

BRONX CITY SERVICE AUTO
REPAIR, INC.

By: 

Julian Estrella,
President